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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ELBERT R. BROWN TRUST;

VIOLA BROWN TRUST;

Adv. Pro. No. 10-05398 (SMB)

DO STAY INC.;

ELBERT BROWN, in his capacities as CREATOR
and TRUSTEE of the ELBERT R. BROWN
TRUST, and INDIVIDUALLY as BENEFICIARY
of the ELBERT R. BROWN TRUST; and

VIOLA BROWN, in her capacities as CREATOR
and TRUSTEE of the VIOLA BROWN TRUST,
and INDIVIDUALLY as BENEFICIARY of the
VIOLA BROWN TRUST,

Defendants.

STIPULATION EXTENDING TIME TO SELECT A MEDIATOR

This Stipulation Extending Time to Select a Mediator (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must select a mediator in the above-captioned case is extended up to and including September 17, 2015.

The purpose of this Stipulation is to provide time for the Parties to resolve this matter prior to engaging in and incurring the costs and expenses of mediation.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: September 3, 2015

BAKER & HOSTETLER LLP

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